

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Case No. 19-11235 (JPS)
	)	
ERIC MARCUS HENRY, SR.	)	Chapter 7
PAULETTE DEAN HENRY,	)	
	)	Judge Jessica E. Price Smith
Debtors.	)	

**APPLICATION OF TRUSTEE TO EMPLOY BRIAN GREENE OF  
COLAGIOVANNI & GREENE AS ACCOUNTANT**

Robert D. Barr, the Trustee herein, respectfully represents to the Court as follows:

1. Robert D. Barr is the Trustee (the “Trustee”) in the within case, which was commenced by the filing of a voluntary petition for relief under Chapter 7 of the Bankruptcy Code on March 8, 2019 (the Debtors’ Case”).
2. The Trustee wishes to employ Brian Greene of the Colagiovanni & Greene firm as Accountant for the Trustee to assist in the administration of the within bankruptcy estate. It is necessary for the Trustee to file tax returns in the within case, due in part to the recovery of an asset which should be reported for tax purposes.
3. The accounting firm Colagiovanni & Greene has experience in creditors’ rights, insolvency, reorganization, business valuations, and bankruptcy matters, and is willing to act as accountants for the Trustee.
4. Brian Greene is an Enrolled Agent and a Certified Fraud Examiner at the Colagiovanni & Greene firm, and is duly qualified to prepare all necessary fiduciary tax returns for the benefit of the estate herein.

5. To the best of the Trustee's knowledge, Colagiovanni & Greene does not hold or represent any interest adverse to the estate, and is a disinterested person within the meaning of 11 U.S.C. Section 101(14).

6. The fees of Colagiovanni & Greene for performing such services shall be determined by the Court upon proper Application and in accordance with the local rules of the United States District Court for the Northern District of Ohio, Eastern Division.

7. The Trustee hereby requests that he be authorized to employ Brian Greene on the terms and conditions set forth in the Affidavit of Brian Greene of the Colagiovanni & Greene firm attached as Exhibit "A."

WHEREFORE, the Trustee prays that his Application be approved, and that he be authorized to employ Brian Greene as Accountant for the Trustee.

Respectfully submitted,

/s/ Robert D. Barr

Robert D. Barr, Trustee (#0067121)  
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Cleveland, Ohio 44114  
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### **NOTICE**

**Pursuant to Local Bankruptcy Rule 9013-1, any objection to this application must be filed by February 5, 2021. If no response or objection is timely filed, the Court is authorized to grant the relief without further notice.**

/s/ Robert D. Barr

Robert D. Barr, Trustee

### **CERTIFICATE OF SERVICE**

I certify that on January 22, 2021, a true and correct copy of the foregoing Application to Employ Accountant was served:

**Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:**

Robert D. Barr, Trustee, at [barr-trustee@koehler.law](mailto:barr-trustee@koehler.law), [rdb@trustesolutions.net](mailto:rdb@trustesolutions.net)

William J. Balena, Attorney for Debtors, at [docket@ohbksource.com](mailto:docket@ohbksource.com),  
[janet@ohbksource.com](mailto:janet@ohbksource.com)

Edward Tufic Saadi, Attorney for the Ohio Bureau of Workers' Compensation, at  
[edwardsaadi@aol.com](mailto:edwardsaadi@aol.com)

United States Trustee (Registered address)@usdoj.gov

**And via regular U.S. mail, postage prepaid, to:**

Brian Greene  
Colagiovanni & Greene  
7840 Mayfield Road  
Chesterland, OH 44026

/s/ Robert D. Barr  
Robert D. Barr, Trustee